

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON TALCUM
POWDER PRODUCTS MARKETING, SALES
PRACTICES AND PRODUCTS LIABILITY
LITIGATION**

MDL No. 3:16-MD-02738-MAS-RLS
JUDGE MICHAEL A. SHIPP
MAG. JUDGE RUKHSANAH L. SINGH

Case No.: 3:23-CV-17718

THIS DOCUMENT RELATES TO:

RUTH GIPSON, INDIVIDUALLY AND ON BEHALF OF
THE ESTATE OF WANDA HARRIS,
Plaintiff,

v.

Johnson & Johnson, et al.,
Defendants.

**RESPONSE TO AUGUST
15, 2024 ORDER TO SHOW
CAUSE (DKT. 33096)**

C. Edward Amos, II of The Segal Law Firm, LC, counsel of record for Plaintiff Ruth Gipson (hereinafter, “Plaintiff”), submits the following Response to the Court’s August 15, 2024 Order to Show Cause Why Cases on the Attached Exhibit A Should Not Be Dismissed With Prejudice (Dkt. 33096).

On September 7, 2023, a Short Form Complaint was directly filed on behalf of Plaintiff in MDL No. 2738. Pursuant to the September 1, 2023 Amended Plaintiff’s Profile Form (“PPF”) Order, a Plaintiff Profile Form, core records, and signed medical records authorizations were required to be served upon Defendants via MDL Centrality by a certain date. Counsel for Plaintiff made several attempts to contact Plaintiff to obtain the necessary information and documentation to comply with the Court’s September 1, 2023, Amended PPF Order. Despite multiple letters via U.S. Regular Mail, U.S. Certified Mail, phone calls, and emails, Plaintiff has not responded to Counsel’s communication attempts.

Given the lack of communication from Plaintiff, Counsel will be filing a motion to withdraw as counsel of record in the underlying case and respectfully requests that the Court not dismiss Plaintiff's Complaint with prejudice until after a decision is issued on the motion to withdraw.

Dated: September 5, 2024

/s/C. Edward Amos

Scott S. Segal, Esq. (WV Bar# 4717)

C. Edward Amos, II, Esq. (WV Bar# 12362)

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CERTIFICATE OF SERVICE

I hereby certify that on September 5, 2024, I filed the foregoing Response to August 15, 2024 Order to Show Cause with the court using CM/ECF which will send notification of such filing to CM/ECF participants.

/s/ C. Edward Amos, II

C. Edward Amos, II (WV Bar I.D. #12362)